

IN THE CIRCUIT COURT OF GREENE COUNTY  
STATE OF MISSOURI

JUDY MARIE LONG & OWEN LONG  
2040 S. Manley Dr.  
Springfield, Missouri 65807

Plaintiffs,

v.

Case No. 1931-CC01381

Barnes & Noble Booksellers, Inc., a Missouri  
Corporation,  
3055 South Glenstone  
Springfield, MO 65804

Service to:  
Registered Agent  
Capitol Corporate Services, Inc.  
222 E. Dunklin, Suite 102  
Jefferson City, MO 65101

And

Barnes & Noble, Inc., a Missouri Corporation,  
3055 South Glenstone  
Springfield, MO 65804

Service to:  
Registered Agent  
Capitol Corporate Services, Inc.  
222 E. Dunklin, Suite 102  
Jefferson City, MO 65101

Defendants.

**PLAINTIFFS' FIRST AMENDED PETITION**

**COUNT I**

**JUDY MARIE LONG'S CLAIM FOR DAMAGES AGAINST  
DEFENDANT BARNES & NOBLE BOOKSELLERS, INC.**

COMES NOW Plaintiff, Judy Marie Long, by and through counsel, Easter Law Firm, LLC,  
and for Count I of Plaintiffs' cause of action against Defendant, Barnes & Noble Booksellers, Inc.

(herein sometimes referred to as “Defendant Barnes & Noble Booksellers”), states and alleges as follows:

1. Plaintiff Judy Marie Long (herein sometimes referred to as “Plaintiff Judy Long” or “Judy”) now is, and at all times hereto, was a resident of Missouri;
2. Defendant Barnes & Noble Booksellers, Inc., is and at all times hereto was a Missouri corporation, Barnes & Noble Booksellers, Inc., and maintains its principal place of business within Greene County, Missouri, at 3055 S. Glenstone Ave., Springfield, Missouri;
3. This cause of action is in tort; that jurisdiction and venue in this action lie in the Circuit Court of Greene County, Missouri, for the reason that the occurrence which is the subject hereof occurred in Greene County, Missouri, and where the amount in controversy exceeds the minimal jurisdictional requirements of this Honorable Court;
4. That at all times mentioned herein, Defendant Barnes & Noble Booksellers owned or operated, or both, the premises on the property located at 3055 S. Glenstone, Springfield, Greene County, Missouri (hereinafter sometimes referred to as the “premises”);
5. That Defendant Barnes & Noble Booksellers allowed the public, including Plaintiff Judy Long, to enter the premises;
6. That on or about December 8, 2018, at or around 7:30 p.m., Plaintiff Judy Long went onto Defendant Barnes & Noble Booksellers’ premises to patronize Defendant Barnes & Noble Booksellers’ retail store. After Plaintiff Judy Long exited Defendant Barnes & Noble Booksellers’ retail store, she tripped and fell when her foot stepped off an uneven and unprotected edge along the side of a handicap curb ramp, which was due to a defective and/or dangerous condition, specifically a drop-off or vertical change in level of greater than one-half inch. The defective and/or dangerous condition was not noticeable by Plaintiff Judy Long, causing her to trip

and fall and suffer injury to her left leg, left knee, left hip, left shoulder, left elbow, left wrist and right ankle;

7. That Defendant Barnes & Noble Booksellers and its servants, agents and employees, were acting within the scope of their employment and knew, or by using ordinary care, could have known of the condition of Defendant Barnes & Noble Booksellers' parking lot;

8. That the area described in Paragraph numbers 6 and 7 *supra*, where Plaintiff Judy Long fell was a dangerous, and/or defective, unsafe condition on the Defendant Barnes & Noble Booksellers' property, at or just before the time of the incident that is the subject of this lawsuit;

9. At the time of the occurrence, Defendant Barnes & Noble Booksellers owed a duty of care to Plaintiff Judy Long and others to warn or barricade, or fix, or otherwise remedy the parking lot that was defective, or all four, or a combination thereof, and Defendant Barnes & Noble Booksellers failed in that duty;

10. At the time of the occurrence, Defendant Barnes & Noble Booksellers owed a duty of ordinary care to Plaintiff Judy Long and others to remedy the unsafe condition of the parking lot that existed at or near the entrance to the building on the premises;

11. That the dangerous and/or defective and unsafe condition was not an open and obvious condition;

12. That Defendant Barnes & Noble Booksellers was negligent at or near the time of the occurrence:

- a. In failing to maintain the premises of the retail property in a reasonably safe condition;
- b. In allowing the parking lot to remain in an unsafe condition;
- c. In failing to verbally warn or place signs to warn of the defective condition of

the premises;

- d. In failing to remedy the dangerous condition at the site of the property, in the aforementioned area of Defendant Barnes & Noble Booksellers' premises;
- e. In failing to otherwise exercise due care with respect to the matters alleged in this petition;

13. That as a result of the acts or omissions, or both, on the part of Defendant Barnes & Noble Booksellers, as alleged in this petition, Plaintiff Judy Long was injured when she fell and injured her left leg, left knee, left hip, left shoulder, left elbow, left wrist and right ankle due to the unsafe condition of the parking lot near the entrance to the building on the premises;

14. That as a direct and proximate result of one or more of the acts or omissions, or both, of Defendant Barnes & Noble Booksellers, Judy has sustained damages and injuries that includes, but is not limited to, the following:

- a. Judy's quality of life has been damaged;
- b. Impairment of Judy's ability to perform various activities of daily living and household activities;
- c. Judy has suffered one or more physical injuries to her body, including but not limited to her left leg, left knee, left hip, left shoulder, left elbow, left wrist and right ankle;
- d. Economic damages;
- e. That one or more of the physical injuries or economic damages sustained by Judy as set forth in this petition are one or more of the following:
  - i. Disabling;
  - ii. Permanent;

- iii. Progressive in nature;
- iv. Reasonably certain to cause future injury, pain, suffering, damage or expense;

f. Miscellaneous expenses;

15. That Plaintiff Judy Long has suffered these injuries, pain and damages since the time of the incident described in this petition, and suffers them at the present time and will suffer them in the future;

16. By reason of her injuries, Plaintiff Judy Long has paid or become obligated for, and will in the future pay or become obligated for items of expense in obtaining and receiving medical care and treatment;

17. That the costs of action herein should be taxed against Defendant Barnes & Noble Booksellers;

18. That such interest as is provided by law should be awarded Plaintiff Judy Long;

WHEREFORE, Plaintiff Judy Marie Long prays for judgment against Defendant Barnes & Noble Booksellers, Inc. for such damages as are fair and reasonable, for her costs of action herein expended, for such interest as is provided by law, and for such other and further relief as this Honorable Court deems just and proper in the interests of justice.

## COUNT II

### JUDY MARIE LONG'S CLAIM FOR DAMAGES AGAINST DEFENDANT BARNES & NOBLE, INC.

COMES NOW Plaintiff, Judy Marie Long, by and through counsel, Easter Law Firm, LLC, and for Count II of Plaintiffs' cause of action against Defendant, Barnes & Noble, Inc. (herein sometimes referred to as "Defendant Barnes & Noble, Inc."), states and alleges as follows:

1. Plaintiff Judy Marie Long (herein sometimes referred to as “Plaintiff Judy Long” or “Judy”) incorporates herein by this reference each and every Allegation of Count I of this Petition as though fully set forth herein *in haec verba*;

2. Defendant Barnes & Noble, Inc., is and at all times hereto was a Missouri corporation, Barnes & Noble, Inc., and maintains its principal place of business within Greene County, Missouri, at 3055 S. Glenstone Ave., Springfield, Missouri;

3. Plaintiff Judy Long now is, and at all times hereto, was a resident of Missouri;

4. This cause of action is in tort; that jurisdiction and venue in this action lie in the Circuit Court of Greene County, Missouri, for the reason that the occurrence which is the subject hereof occurred in Greene County, Missouri, and where the amount in controversy exceeds the minimal jurisdictional requirements of this Honorable Court;

5. That at all times mentioned herein, Defendant Barnes & Noble, Inc. owned or operated, or both, the premises on the property located at 3055 S. Glenstone, Springfield, Greene County, Missouri (hereinafter sometimes referred to as the “premises”);

6. That Defendant Barnes & Noble, Inc. allowed the public, including Plaintiff Judy Long, to enter the premises;

7. That on or about December 8, 2018, at or around 7:30 p.m., Plaintiff Judy Long went onto Defendant Barnes & Noble, Inc.’s premises to patronize Defendant Barnes & Noble Inc.’s retail store. After Plaintiff Judy Long exited the Barnes & Noble retail store, she tripped and fell when her foot stepped off an uneven and unprotected edge along the side of a handicap curb ramp, which was due to a defective and/or dangerous condition, specifically a drop-off or vertical change in level of greater than one-half inch. The defective and/or dangerous condition was not noticeable by Plaintiff Judy Long, causing her to trip and fall and suffer injury to her left

leg, left knee, left hip, left shoulder, left elbow, left wrist and right ankle;

8. That Defendant Barnes & Noble, Inc. and its servants, agents and employees, were acting within the scope of their employment and knew, or by using ordinary care, could have known of the condition of Defendant Barnes & Noble, Inc.'s parking lot;

9. That the area described in Paragraph numbers 7 and 8 *supra*, where Plaintiff Judy Long fell was a dangerous, and/or defective, unsafe condition on the Defendant Barnes & Noble, Inc.'s property, at or just before the time of the incident that is the subject of this lawsuit;

10. At the time of the occurrence, Defendant Barnes & Noble, Inc. owed a duty of care to Plaintiff Judy Long and others to warn or barricade, or fix, or otherwise remedy the parking lot that was defective, or all four, or a combination thereof, and Defendant Barnes & Noble, Inc. failed in that duty;

11. At the time of the occurrence, Defendant Barnes & Noble, Inc. owed a duty of ordinary care to Plaintiff Judy Long and others to remedy the unsafe condition of the parking lot that existed at or near the entrance to the building on the premises;

12. That the dangerous and/or defective and unsafe condition was not an open and obvious condition;

13. That Defendant Barnes & Noble, Inc. was negligent at or near the time of the occurrence:

- a. In failing to maintain the premises of the retail property in a reasonably safe condition;
- b. In allowing the parking lot to remain in an unsafe condition;
- c. In failing to verbally warn or place signs to warn of the defective condition of the premises;

- d. In failing to remedy the dangerous condition at the site of the property, in the aforementioned area of Defendant Barnes & Noble Inc.'s premises;
- e. In failing to otherwise exercise due care with respect to the matters alleged in this petition;

14. That as a result of the acts or omissions, or both, on the part of Defendant Barnes & Noble, Inc., as alleged in this petition, Plaintiff Judy Long was injured when she fell and injured her left leg, left knee, left hip, left shoulder, left elbow, left wrist and right ankle due to the unsafe condition of the parking lot near the entrance to the building on the premises;

15. That as a direct and proximate result of one or more of the acts or omissions, or both, of Defendant Barnes & Noble, Inc., Judy has sustained damages and injuries that includes, but is not limited to, the following:

- a. Judy's quality of life has been damaged;
- b. Impairment of Judy's ability to perform various activities of daily living and household activities;
- c. Judy has suffered one or more physical injuries to her body, including but not limited to her left leg, left knee, left hip, left shoulder, left elbow, left wrist and right ankle;
- d. Economic damages;
- e. That one or more of the physical injuries or economic damages sustained by Judy as set forth in this petition are one or more of the following:
  - i. Disabling;
  - ii. Permanent;
  - iii. Progressive in nature;



iv. Reasonably certain to cause future injury, pain, suffering, damage or expense;

f. Miscellaneous expenses;

16. That Plaintiff Judy Long has suffered these injuries, pain and damages since the time of the incident described in this petition, and suffers them at the present time and will suffer them in the future;

17. By reason of her injuries, Plaintiff Judy Long has paid or become obligated for, and will in the future pay or become obligated for items of expense in obtaining and receiving medical care and treatment;

18. That the costs of action herein should be taxed against Defendant Barnes & Noble, Inc.;

19. That such interest as is provided by law should be awarded Plaintiff Judy Long;

WHEREFORE, Plaintiff Judy Marie Long prays for judgment against Defendant Barnes & Noble, Inc. for such damages as are fair and reasonable, for her costs of action herein expended, for such interest as is provided by law, and for such other and further relief as this Honorable Court deems just and proper in the interests of justice.

### COUNT III

#### OWEN LONG'S LOSS OF CONSORTIUM CLAIM AGAINST DEFENDANT BARNES & NOBLE BOOKSELLERS, INC.

COMES NOW Plaintiff, Owen Long, by and through counsel, Easter Law Firm, LLC, and for Count III of Plaintiffs' cause of action against Defendant Barnes & Noble Booksellers, Inc. (herein sometimes referred to as "Defendant Barnes & Noble Booksellers"), states, alleges and avers as follows:

1. Plaintiff Owen Long (herein sometimes referred to as "Owen") incorporates herein by this reference each and every Allegation of Count I and II of this Petition as though fully set forth herein *in haec verba*;

2. That Plaintiff Owen Long is, and at all time pertinent hereto, was the legal spouse of Judy Long;

3. That as a direct and proximate result of one or more of the acts or omissions of Defendant Barnes & Noble Booksellers as alleged herein, Owen has sustained damages, which include, but are not necessarily limited to, one or more of the following:

- (a) Despair, heartache and worry due to Judy's condition;
- (b) Loss of the affection, attention, services, support, comfort, consortium and companionship of Judy;
- (c) The reasonable value of nursing services provided to Judy;
- (d) Medical expenses for Judy;
- (e) Economic damages;
- (f) That one or more of the injuries and damages of Judy set forth in this petition are permanent or progressive and are reasonably certain to cause future injury, pain, suffering, damage or expense;

4. The costs of this action should be taxed against Defendant Barnes & Noble Booksellers;

5. That such interest as is provided by law should be awarded to Plaintiff Owen Long.

WHEREFORE, Plaintiff Owen Long prays for judgment against Defendant Barnes & Noble Booksellers, Inc., for such damages as are fair, reasonable, for his costs of action herein

expended, for such interest as provided by law and for such other and further relief as this Honorable Court deems just and proper.

**COUNT IV**

**OWEN LONG'S LOSS OF CONSORTIUM CLAIM AGAINST  
DEFENDANT BARNES & NOBLE, INC.**

COMES NOW Plaintiff, Owen Long, by and through counsel, Easter Law Firm, LLC, and for Count IV of Plaintiffs' cause of action against Defendant, Barnes & Noble, Inc. (herein sometimes referred to as "Defendant Barnes & Noble, Inc."), states, alleges and avers as follows:

1. Plaintiff Owen Long (herein sometimes referred to as "Owen") incorporates herein by this reference each and every Allegation of Count I, II, and III of this Petition as though fully set forth herein *in haec verba*;

2. That Plaintiff Owen Long is, and at all time pertinent hereto, was the legal spouse of Judy Long;

3. That as a direct and proximate result of one or more of the acts or omissions of Defendant Barnes & Noble, Inc. as alleged herein, Owen has sustained damages, which include, but are not necessarily limited to, one or more of the following:

- (a) Despair, heartache and worry due to Judy's condition;
- (b) Loss of the affection, attention, services, support, comfort, consortium and companionship of Judy;
- (c) The reasonable value of nursing services provided to Judy;
- (d) Medical expenses for Judy;
- (e) Economic damages;

(f) That one or more of the injuries and damages of Judy set forth in this petition are permanent or progressive and are reasonably certain to cause future injury, pain, suffering, damage or expense;

4. The costs of this action should be taxed against Defendant Barnes & Noble, Inc.;
5. That such interest as is provided by law should be awarded to Plaintiff Owen Long.

WHEREFORE, Plaintiff Owen Long prays for judgment against Defendant Barnes & Noble, Inc., for such damages as are fair, reasonable, for his costs of action herein expended, for such interest as provided by law and for such other and further relief as this Honorable Court deems just and proper.

Respectfully submitted,

EASTER LAW FIRM, LLC

/s/Cheryl P. Hom

Joseph I. Easter, MO Bar No. 57644

Cheryl Price Hom, MO Bar No. 70671

806 W. Battlefield Rd, Ste. A

Springfield, Missouri 65807

Telephone: (417) 888-0258

Fax: (417) 888-0279

Email: [joe@easterlawfirm.com](mailto:joe@easterlawfirm.com)  
[cheryl@easterlawfirm.com](mailto:cheryl@easterlawfirm.com)

ATTORNEYS FOR THE PLAINTIFFS



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## 1931-CC01381 - JUDY M LONG ET AL V BARNES & NOBLE ET AL (E-CASE)

<a href="#">Case Header</a>	<a href="#">Parties &amp; Attorneys</a>	<a href="#">Docket Entries</a>	<a href="#">Charges, Judgments &amp; Sentences</a>	<a href="#">Service Information</a>	<a href="#">Filings Due</a>	<a href="#">Scheduled Hearings &amp; Trials</a>	<a href="#">Civil Judgments</a>	<a href="#">Garnishments/ Execution</a>
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Sort Date Entries: ☒ Descending ☐ Ascending

Display Options: 

03/27/2020	<b>Entry of Appearance Filed</b> Entry of Appearance by Atty Jennie Simons on Behalf of Dfts; Electronic Filing Certificate of Service./jc <b>Filed By:</b> PATRICIA JENNINE SIMONS <b>On Behalf Of:</b> BARNES & NOBLE BOOKSELLERS INC A MISSOURI CORPORATION, BARNES & NOBLE INC A MISSOURI CORPORATION <b>Entry of Appearance Filed</b> Entry of Appearance by Atty Daniel E Tranen on Behalf of Dfts; Electronic Filing Certificate of Service./jc <b>Filed By:</b> DANIEL EPHRIAM TRANEN <b>On Behalf Of:</b> BARNES & NOBLE BOOKSELLERS INC A MISSOURI CORPORATION, BARNES & NOBLE INC A MISSOURI CORPORATION
03/24/2020	<b>Corporation Served</b> Document ID - 20-SMCC-390; Served To - BARNES & NOBLE INC A MISSOURI CORPORATION; Server - SO COLE COUNTY-JEFFERSON CITY; Served Date - 04-MAR-20; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - By leaving a copy with Shelia Smith (designee). <b>Corporation Served</b> Document ID - 20-SMCC-389; Served To - BARNES & NOBLE BOOKSELLERS INC A MISSOURI CORPORATION; Server - SO COLE COUNTY-JEFFERSON CITY; Served Date - 04-MAR-20; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - By leaving a copy with Sheila Smith (designee).
02/21/2020	<b>Summons Issued-Circuit</b> Document ID: 20-SMCC-390, for BARNES & NOBLE INC A MISSOURI CORPORATION. Summons saved and attached in PDF format for Attorney to retrieve from secure case.net./cr <b>Summons Issued-Circuit</b> Document ID: 20-SMCC-389, for BARNES & NOBLE BOOKSELLERS INC A MISSOURI CORPORATION. Summons saved and attached in PDF format for Attorney to retrieve from secure case.net./cr
02/18/2020	<b>Amended Motion/Petition Filed</b> Plts First Amended Petition deemed filed./cr <b>Summ Req-Circuit Pers Serv</b> Plts Request for Additional Summons; Electronic Filing Certificate of Service./cr <b>Filed By:</b> CHERYL PRICE HOM <b>On Behalf Of:</b> JUDY MARIE LONG, OWEN LONG <b>Order to Vacate/Set Aside</b> PLAINTIFF BY C. HOM. NO OTHER APPEARANCES. PRIOR INTERLOCUTORY JUDGMENT OF DEFAULT IS NOW SET ASIDE. PLAINTIFF IS GRANTED LEAVE TO AMEND AND AMENDMENT IS DEEMED FILED. JRB/dlb <b>Associated Entries:</b> 02/14/2020 - Civil Motion Hearing Scheduled <b>Scheduled For:</b> 02/18/2020; 9:00 AM ; JASON R BROWN; Greene
02/14/2020	<b>Civil Motion Hearing Scheduled</b> <b>Associated Entries:</b> 02/18/2020 - Order to Vacate/Set Aside

**Scheduled For:** 02/18/2020; 9:00 AM ; JASON R BROWN; Greene

**Notice of Hearing Filed**

Plts Notice of Hearing as to its Motion for Leave to File First Amended Petition. Set for 2-18-2020 at 9:00 AM; Electronic Filing Certificate of Service./cr

**Filed By:** CHERYL PRICE HOM

**On Behalf Of:** JUDY MARIE LONG, OWEN LONG

**Other Proposed Document Filed**

Plts Proposed Plts First Amended Petition; Electronic Filing Certificate of Service./cr

**Filed By:** CHERYL PRICE HOM

**Motion for Leave**

Plts Motion for Leave to File First Amended Petition; Electronic Filing Certificate of Service./cr

**Filed By:** CHERYL PRICE HOM

**02/06/2020**

**Case Review Scheduled**

**Judge/Clerk - Note**

HEARING CANCELLED PER NOTICE FILED BY COUNSEL. PULL TO REVIEW IN 45 DAY. JRB/dlb

**Associated Entries:** 01/09/2020 - Hearing Scheduled

**Scheduled For:** 02/06/2020; 9:30 AM ; JASON R BROWN; Greene

**02/05/2020**

**Notice**

Plts Notice of Cancellation of Hearing. Sent to Court 2-6-20 at 9:40 AM; Electronic Filing Certificate of Service./cr

**Filed By:** CHERYL PRICE HOM

**On Behalf Of:** JUDY MARIE LONG, OWEN LONG

**01/09/2020**

**Hearing Scheduled**

**Associated Entries:** 02/06/2020 - Judge/Clerk - Note 

**Scheduled For:** 02/06/2020; 9:30 AM ; JASON R BROWN; Greene

**Interlocutory/Partial Judmt**

\*\*\*Interlocutory Judgment set aside 2/18/20./cr\*\*\* Plaintiff by Atty C. Holm. No other appearances.

Plaintiff granted Interlocutory Default Judgment. Damages Hearing set in CC-1 on 2/6/2020 at 9:30 a.m.


Division 3 acting. JRB/ear \*\*\*Interlocutory Judgment set aside 2/18/20./cr\*\*\*

**Associated Entries:** 12/27/2019 - Civil Motion Hearing Scheduled

**Scheduled For:** 01/09/2020; 9:00 AM ; JASON R BROWN; Greene

**12/27/2019**

**Civil Motion Hearing Scheduled**

**Associated Entries:** 01/09/2020 - Interlocutory/Partial Judmt 

**Scheduled For:** 01/09/2020; 9:00 AM ; JASON R BROWN; Greene

**Amended Notice of Hrng Filed**

Plts Amended Notice of Hearing as to Motion for Interlocutory Default set 1/9/20 at 9:00 am. /kj

**Filed By:** CHERYL PRICE HOM

**On Behalf Of:** JUDY MARIE LONG, OWEN LONG

**12/20/2019**

**Entry of Appearance Filed**

Entry of Appearance by Atty Joe Easter on behalf of Plts./ba

**Filed By:** JOSEPH IAN EASTER

**On Behalf Of:** JUDY MARIE LONG, OWEN LONG

**Notice of Hearing Filed**

Plts Notice of Hearing as to its Motion for Interlocutory Judgment, Set for 1-2-20 at 9:00 AM./ba

**Filed By:** CHERYL PRICE HOM

**On Behalf Of:** JUDY MARIE LONG, OWEN LONG

**Proposed Order Filed**

Plts Proposed Order for Entry of Interlocutory Judgment, Sent to Court 12-23-19 at 9:10 AM./ba

**Filed By:** CHERYL PRICE HOM

**Motion for Default Judgment**

Plts Motion for Entry of Interlocutory Order of Default Against Dft Barnes and Noble./ba

**Filed By:** CHERYL PRICE HOM

**12/16/2019**

**Corporation Served**

Document ID - 19-SMCC-2602; Served To - BARNES & NOBLE; Server - SO COLE COUNTY-JEFFERSON CITY; Served Date - 18-NOV-19; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - By leaving a copy with Capitol Corp Serv - Shelia Smith (designee).

**11/07/2019**

**Summons Issued-Circuit**

Document ID: 19-SMCC-2602, for BARNES & NOBLE. Summons saved and attached in PDF format for Attorney to retrieve from secure case.net./cr

**11/06/2019**

**Filing Info Sheet eFiling**

**Filed By:** CHERYL PRICE HOM

**Pet Filed in Circuit Ct**

Plts Petition./cr

**On Behalf Of:** JUDY MARIE LONG, OWEN LONG

**Judge Assigned**